

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ANDREW HEDDEN, et al.,

NO. C05-0999 TSZ

Plaintiffs,

NOTICE OF DEPOSITION AND
SUBPOENA DUCES TECUM TO
ROBERT BARNES

v.

CITY OF SEATTLE, et al.,

Defendants.

To: Robert Barnes
c/o Paul Richmond
Law Office of Paul Richmond
600 First Avenue, Suite 331
Seattle, WA 98104

YOU ARE HEREBY COMMANDED to be and appear at the offices of STAFFORD
FREY COOPER, 3100 Two Union Square, 601 Union Street, Seattle, Washington 98101
on Friday, December 22, 2006, at 1:00 p.m., then and there to give testimony upon oral
examination at the request of the defendants in the above-entitled cause, and to remain in
attendance upon the undersigned or other Notary Public until discharged.

YOU ARE FURTHER COMMANDED to bring with you at said time and place the
following documents or tangible things:

NOTICE OF DEPOSITION AND SUBPOENA DUCES
TECUM TO ROBERT BARNES - 1

C05-0999 TSZ
3019-027230 121162

STAFFORD FREY COOPER

PROFESSIONAL CORPORATION

601 Union Street, Suite 3100

Seattle WA 98101.1374

TEL 206.623.9900 FAX 206.624.6885

1. All diaries, documents, e-mails, and written notes that reflect your *observations* of the demonstration events.¹
2. All photographs, audio recordings, video recordings, or other media taken by you of the demonstration events.
3. A copy of the flyers you handed out during the demonstration.
4. All evidence gathered at the scene of the demonstration, including but not limited to physical evidence of "non-lethal" weaponry.
5. All documents, materials, and/or written communications exchanged between you and the plaintiffs or other demonstrators before and during the demonstration.
6. All documents related to the permitting process for the demonstration.

HEREIN FAIL NOT AT YOUR PERIL.

DATED this 13th day of December, 2006.

STAFFORD FREY COOPER

By: /s/ Ted Buck via ECF

Ted Buck, WSBA #22029
Krista S. Mirhoseini, WSBA #22134
Darrin E. Bailey, WSBA #34955
Attorneys for Defendant City of Seattle
Stafford Frey Cooper
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TBuck@StaffordFrey.com
KMirhoseini@StaffordFrey.com
DBailey@StaffordFrey.com

¹ Demonstration refers to the demonstration that occurred in Seattle, Washington on June 2, 2003, as referenced in your Complaint.

Certificate of Service

I certify that on the date noted below I electronically filed this document entitled Notice of Deposition and Subpoena Duces Tecum to Robert Barnes with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following persons:

Paul Richmond
Law Office of Paul Richmond
600 First Avenue, Suite 331
Seattle, WA 98104
(206) 382-6275
FAX: (206) 382-4941
Attorneys for Plaintiffs

DATED this 13th day of December, 2006, at Seattle, Washington.

STAFFORD FREY COOPER

By: /s/ Ted Buck via ECF
Darrin E. Bailey, WSBA #34955
Attorneys for Defendant
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NOTICE OF DEPOSITION AND SUBPOENA DUCES
TECUM TO ROBERT BARNES - 3

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